

III. REMARKS

Claims 1-4 are not anticipated by Paping (U.S. 20030225711) under 35 U.S.C. §102(e).

Applicant's invention as recited in claim 1 is directed to a trusted gateway for a proof-of-postage system. In this regard, Applicant's invention includes a secure accounting and financial system and a secure connection between the meter and accounting system. This is not disclosed or suggested by Paping.

Paping discloses a franking module allowing a customer to apply unique indicia to a mail piece for authorizing postal transaction. (Abstract, lines 1-3). The indicia do not include postage and the franking module does not store and account for postage. (Abstract, lines 3-6). The indicia include customer account information that is registered with the post office and the indicia are also encrypted. The indicia are read and a post office processor, remote from the franking module, calculates postage. The amount of postage is debited from the customer's account as the mail piece clears the initial processing. (Abstract, lines 6-12). Paping does not suggest or disclose a secure connection between the meter and an accounting and financial system providing at least authentication and encryption between the meter and the financial system and accounting. Paping also does not disclose a secure accounting and financial system for providing secure information to the meter.

The financial and accounting of Paping, referred to by the Examiner, refers to the ability to calculate postage and apply it to the mail item. The "financial" aspect of the postal transaction is transferred to a payment server [0047]. The user

infrastructure of Paping includes a postage security device and accounts for postal value [0017]. These features of Paping are related to a franking module for printing of a postage amount for USPS scanning and account debiting. However, Paping does not disclose or suggest the trusted gateway that is recited and claimed in Applicant's invention.

Applicant recites a secure connection between the meter and accounting system and a user interface remotely coupled to the meter. This is not disclosed or suggested by Paping, in paragraphs [0037] and [0008] merely talks about encrypted authentication data. This is only the indicia, and Paping does not suggest a secure "connection" as is described and claimed by Applicant. The "encrypted authentication data" is "printed" on the mail item. ([0037], lines 5-8). It is not "transmitted" through the system as is stated by the Examiner. Paragraph [0023] referenced by the Examiner, merely speaks to the scanner/reader at the post office, that receives the indicia applied by the franking module. A processing module remote from the meter checks and authorizes the transaction. The centralized computer, data storage and processor can be connected by telephone or wireless means to the onsite mail processor "which initially receives the mail item and reads the data on the indicia". This is not the same as the "secure connection" claimed by Applicant, that provides at least "authentication and encryption" between the meter and the financial system and accounting.

There is also no disclosure in Paping of a user interface that is remotely coupled to the meter that allows a user to "access the meter functionality" with respect to the accounting and financial system.

The "device" referred to in paragraph [0035] is a franking module. (see [0030], franking module 1 of FIG. 1). This is not the same as or similar to a "user interface" remotely coupled to the meter, as is recited and claimed by Applicant. Thus, Paping does not disclose or suggest each and every feature of Applicant's invention as recited in the claims. Therefore, Paping cannot anticipate Applicant's invention for purposes of 35 U.S.C. §102(e).

Also, Paping is generally directed to a "franking module 1" and USPS scanning an indicia at the mail intake facility and then charging or debiting a customer's account. It has a keyboard 12 and display 13. It is used for franking mail items with postal indicia. "Historical data relating to the use of the franking module and any other critical data to be retained in the non-volatile memories 15, 16". [0032]. No "accounting data or postage related data are used by the franking module." Thus, Paping is not similar to Applicant's invention in this regard.

In Paping, the franking module 1 operates in a secure manner and is thus housed in a secure housing 28 [0034]. The device is a handheld unit for processing small volumes of mail [0035].

The franking module prints an indicia on the mail item, the indicia including encrypted authentication data. [0037]. This data comes from the historical and critical data retained in non-volatile memories 15, 16 [0032].

The mail items, when received at the postal service are scanned to verify the indicia [0038]. The postal transactions are

recorded in a database 6, which can be sent to a centralized billing system [0040].

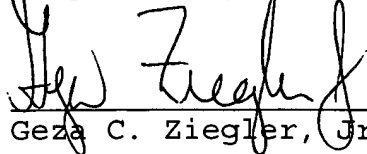
Nothing in Paping relates to the trusted gateway recited and claimed by Applicant. Applicant's invention extends the functionality of a metering system so a user interface can be remotely coupled to the meter, and allows the user to access the meter functionality with respect to the accounting and financial system. There is no such disclosure or suggestion in Paping. Since each feature of Applicant's invention is not disclosed or suggested by Paping, Paping cannot anticipate Applicant's invention.

Claims 2-4 should be allowable at least by reason of their dependencies.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



Geza C. Ziegler, Jr.
Reg. No. 44,004

6 Sep 2005

Date

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800
Customer No.: 2512

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